

Andrew T. Solomon (AS9200)
SULLIVAN & WORCESTER LLP
1290 Avenue of the Americas, 29th Floor
New York, NY 10104
(212) 660-3000 (phone)
(212) 660-3001 (fax)

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN K. GRAHAM, as TRUSTEE of the POST
OFFICE SQUARE SPECIAL TRUST,

Plaintiff,

vs.

JOEL ROSENMAN, et al.,

Defendants.

1:07-cv-08407(CHS)(KF)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Andrew T. Solomon, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of

Joshua L. Solomon
SULLIVAN & WORCESTER LLP
One Post Office Square
Boston, MA 02109
Telephone: (617) 338-2800
Facsimile: (617) 338-2880
Email: jsolomon@sandw.com

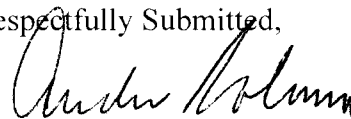
Joshua L. Solomon has been a member in good standing of the bar of the Commonwealth of Massachusetts since 2004. He is admitted to practice before the U.S. District Court, District of Massachusetts, the U.S. District Court for the Northern District of Illinois, the U.S. Court of Federal Claims, the U.S. Court of Appeals for the First Circuit, the U.S. Court of

Appeals for the Third Circuit, the U.S. Court of Appeals for the Ninth Circuit, and U.S. Court of Appeals for the Federal Circuit.

There are no disciplinary proceedings against Joshua L. Solomon pending in any State or Federal Court.

Dated: New York, New York
October 24, 2007

Respectfully Submitted,



Andrew T. Solomon (AS9200)
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**AFFIDAVIT OF
ANDREW T. SOLOMON
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ANDREW T. SOLOMON, being duly sworn, deposes and says:

1. I am a member of the law firm Sullivan & Worcester LLP, attorneys for plaintiff John K. Graham, as Trustee of the Post Office Square Special Trust ("Plaintiff"), in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Joshua L. Solomon as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Joshua L. Solomon since 2004.

4. Mr. Solomon is an associate of the law firm Sullivan & Worcester LLP. I have found Mr. Solomon to be a skilled attorney and a person of integrity. He has been a member in good standing of the bar of the Commonwealth of Massachusetts since 2004. He is admitted to practice before the U.S. District Court, District of Massachusetts, the U.S. District Court for the Northern District of Illinois, the U.S. Court of Federal Claims, the U.S. Court of Appeals for the First Circuit, the U.S. Court of Appeals for the Third Circuit, the U.S. Court of Appeals for the Ninth Circuit, and U.S. Court of Appeals for the Federal Circuit.

5. Accordingly, I am pleased to move the admission of Joshua L. Solomon, pro hac vice.

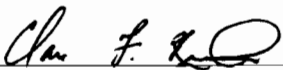
6. I respectfully submit a proposed order granting the admission of Joshua L. Solomon, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Mr. Solomon, pro hac vice, to represent Plaintiff in this action, be granted.



ANDREW T. SOLOMON (AS9200)

Sworn to before me this
24th day of October 2007



Notary Public

CLARE F. KEELAN
Notary Public, State Of New York
No. 31-4712220
Qualified In New York County
Commission Expires June 30. 2010

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **nineteenth** day of **March** A.D. **2004**, said Court being the highest Court of Record in said Commonwealth:

Joshua L. Solomon

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **second** day of **October** in the year of our Lord **two thousand and seven**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

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AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

1. Hela Levi, being duly sworn, deposes and says: that she is over eighteen years of age, that she resides in New York, New York and that she is not a party to this action.

2. On October 24, 2007, the undersigned served the within Motion to Admit Joshua L. Solomon Pro Hac Vice and supporting papers by First Class Mail upon the parties listed below at the addresses listed below:

Joel Rosenman
Source Financing Investors LLC
488 Madison Avenue, 18th Floor
New York, NY 10022

Norman Hsu, Inmate
San Mateo County Jail
400 County Center
Redwood City, CA 94063

Martin L. Waters
488 Alta Vista Way
Laguna Beach, CA 92651

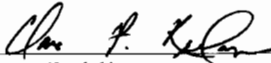
Source Financing Investors LLC
488 Madison Avenue, 18th Floor
New York, NY 10022

Briar Wood Investments, LLC
Perri Westland
Westland Business Services, INC.
428 Main ST #202
Huntington Beach, CA 92648



Hela Levi

Sworn to before me this
24th day of October 2007



Notary Public

CLARE F. KEELAN
Notary Public, State Of New York
No. 31-4712220
Qualified In New York County
Commission Expires June 30, 2012